

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

FILED

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CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY



UNITED STATES OF AMERICA,

Plaintiff,

v.

MARTHA VALERO,

Defendant.

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No. EP-17-_____

EP 17 CR 2215

GOVERNMENT'S MOTION TO DETAIN DEFENDANT
WITHOUT BOND AND MOTION FOR CONTINUANCE

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendant has been charged by Indictment with a violation of Title 18, United States Code, Section 1591(a)(1) and (b)(2), Sex Trafficking of a Child.
2. The Defendant has a prior criminal history.
3. There are no conditions or combination of conditions which will reasonably assure the safety of the community should Defendant be released on bond.
4. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

RICHARD L. DURBIN, JR.
UNITED STATES ATTORNEY

By:

A handwritten signature in cursive script, appearing to read "P. Acosta", written over a horizontal line.

PATRICIA J. ACOSTA
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